

**PEM LAW LLP**

Rajiv D. Parikh, Esq. (032462005)  
Kathleen Barnett Einhorn, Esq. (040161992)  
Jessica A. Merejo, Esq. (288592020)  
1 Boland Drive, Suite 101  
West Orange, New Jersey 07502  
Telephone: (973) 577-550  
Facsimile: (973) 860-4433  
Email: [rparikh@pemlawfirm.com](mailto:rparikh@pemlawfirm.com)  
[keinhorn@pemlawfirm.com](mailto:keinhorn@pemlawfirm.com)  
[jmerejo@pemlawfirm.com](mailto:jmerejo@pemlawfirm.com)

**MORGAN & MORGAN**

John A. Yanchunis, Esq. (*pro hac vice* to be filed)  
201 N. Franklin Street, 7th Floor  
Tampa, FL 33602  
Tel.: (813) 223-5505  
Email: [jyanchunis@forthepeople.com](mailto:jyanchunis@forthepeople.com)

*Attorneys for Plaintiffs, Atlas Data Privacy Corporation, as assignee of individuals who are Covered Persons; Jane Doe-1 and Jane Doe-2, law enforcement officers; and Peter Andreyev*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION,  
*as assignee of individuals who are Covered Persons,*  
JANE DOE-1, *a law enforcement officer,* JANE  
DOE-2, *a law enforcement officer,* and PETER  
ANDREYEV,

Plaintiffs,

v.

GOHUNT, LLC, GOHUNT MANAGEMENT  
HOLDINGS, LLC, GOHUNT MANAGEMENT  
HOLDINGS II, LLC, RICHARD ROES 1-10,  
*fictitious names of unknown individuals* and ABC  
COMPANIES 1-10, *fictitious names of unknown  
entities.*

Defendants.

Civil Action No. 1:24-cv-4380

---

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
MOTION TO DISQUALIFY COUNSEL FOR DEFENDANTS**

---

Plaintiffs, pursuant to Fed. R. Civ. P. 6(b)(1), file this unopposed motion for an extension of time to file a motion to disqualify counsel for Defendants. In support, Plaintiffs state:

1. On April 2, 2025, this Court set April 17, 2025 as the deadline for Plaintiffs to file any motion to disqualify counsel for Defendants in Atlas Data Privacy Corp., et al. v. GoHunt, LLC, et al., Civ. A. No. 24-4380. [ECF 50].

2. Plaintiffs have been working with counsel for Defendants to explore whether they can resolve some or all of the issues related to the contemplated motion to disqualify counsel.

3. In connection with these ongoing discussions, Plaintiffs seek a one-week extension of the deadlines set in connection with any motion to disqualify, and respectfully request that this Court enter an Order resetting the briefing schedule on any motion to disqualify counsel for Defendants as follows:

- a. Plaintiffs shall file any motion to disqualify counsel on or before April 24, 2025.
- b. Defendants shall file any brief in opposition to any motion to disqualify counsel on or before May 8, 2025.
- c. Plaintiffs shall file any reply on or before May 16, 2025.

4. Although the present motion is not filed jointly or by consent, Counsel for Defendants spoke with my co-counsel, John A. Yanchunis, Esq. of Morgan & Morgan, Complex Litigation Group, and in that conversation, counsel for Defendants indicated that relief requested herein is unopposed.

5. This extension will not prejudice any party.

**WHEREFORE**, Plaintiffs respectfully request that this Court enter an Order providing Plaintiffs an extension to file any motion to disqualify counsel for Defendants and resetting the briefing schedule on such a motion accordingly.

Dated: April 17, 2025

Respectfully submitted,

**PEM LAW LLP**  
*Attorneys for Plaintiffs*

By: s/ Rajiv D. Parikh  
RAJIV D. PARIKH